



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

August 29, 2018

Mr. Russ St. Onge, EHS Manager
Acument Global Technologies
6125 18 Mile Road
Sterling Heights, Michigan 48314

SRN: N5779, Macomb County

Dear Mr. St. Onge:

VIOLATION NOTICE

On July 30, 2018 , the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the "VOC Emissions Test Report" dated July 26, 2018, for the emissions test conducted to evaluate Volatile Organic Compounds (VOC) emission from the two stacks associated with EU-F2, a metal heat treatment belt line for metal fasteners, at Acument Global Technologies (facility) located at 6125 18 Mile Road, Sterling Heights, Michigan. The emissions test was conducted to verify EU-F2's compliance with the conditions of Permit to Install (PTI) number 85-17.

A review of the test report showed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-F2	PTI No. 85-17, SC I.1	At the time the PTI was reviewed a VOC emission factor of 0.374 lb/ton of metal processed was used. Based on this emission factor VOC emissions from EU-F2 was limited to 3.3 tons per year. The stack test report indicated that the actual VOC emission factor is 0.89 lb/ton of metal processed. Based on this emission factor and material process limit of 17,520 tons per year, the annual VOC emissions is calculated to be 7.8 tons.
EU-F2	PTI No. 85-17, SC VII.1	The PTI requires that within 30 days after completion of the installation of EU-F2, the permittee shall notify the AQD District Supervisor, in writing, of the completion of the activity. The permittee failed to inform AQD about the completion of installation of EU-F2.

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Furthermore, the PTI No. 85-17, SC V.1 requires that the facility shall verify VOC emissions from EU-F2 within 90 days after the commencement of initial startup. Verification of this requirement was not available due to the lack notification from the permittee. In its response to the above violations, the facility must state the reason for the delay, if it occurred, in the verification of VOC emissions.


Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Global Acument Technologies believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Acument Global Technologoes. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sebastian G. Kallumkal
Senior Environmental Engineer
Air Quality Division
586-753-3738

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ